

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VLSI TECHNOLOGY LLC,
Plaintiff,

v.

INTEL CORPORATION,
Defendant.

Cause No. No. 6:21-cv-000057-ADA

**NOTICE OF SUBSEQUENT DEVELOPMENTS RELATED TO
DEFENDANT INTEL CORPORATION'S MOTION FOR LEAVE TO
FILE AMENDED ANSWER, DEFENSES, AND COUNTERCLAIMS
AND TO SEVER AND STAY DEFENSE OF LICENSE¹**

Intel Corporation ("Intel") files this notice to inform the Court of subsequent developments relevant to its Motion for Leave to File Amended Answer, Defenses, and Counterclaims in Case No. 6:19-cv-254 filed on November 10, 2020. ECF 348-02. That motion requested leave to amend to add the affirmative defense of license based on the November 20, 2012 license agreement between Intel and Finjan, Inc. Pursuant to the dispute resolution procedure required under the license, Intel filed a complaint in the Delaware Court of Chancery on January 11, 2021 against Fortress Investment Group LLC, VLSI Technology LLC, and Finjan, Inc., among other entities. The Complaint seeks, *inter alia*, a declaration that Intel is licensed to the Asserted Patents in this case. Intel further incorporates the relevant facts and arguments set forth in its Motion for Leave

¹ This notice is related to Intel's Motion to Amend addressing Case No. 6:19-cv-254, filed in the lead case, No. 1:19-cv-977-ADA. ECF 348-02. Pursuant to the Court's January 21, 2021 notice regarding retransfer to the Waco Division, Intel has filed this notice in Case No. 6:21-cv-57.

to File Amended Answers, Defenses, and Counterclaims and to Sever and Stay Defense of License filed simultaneously with this notice related to Case Nos. 6:19-cv-255 and 6:19-cv-256.

Dated: February 2, 2021

Respectfully submitted,

OF COUNSEL:

William F. Lee (*Pro Hac Vice*)
Louis W. Tompros (*Pro Hac Vice*)
Kate Saxton (*Pro Hac Vice*)
WILMER CUTLER PICKERING HALE
& DORR LLP
60 State Street
Boston, Massachusetts 02109
Tel: (617) 526-6000
Email: william.lee@wilmerhale.com
Email: louis.tompros@wilmerhale.com
Email: kate.saxton@wilmerhale.com

Gregory H. Lantier (*Pro Hac Vice*)
Amanda L. Major (*Pro Hac Vice*)
WILMER CUTLER PICKERING HALE
& DORR LLP
1875 Pennsylvania Avenue
Washington DC 20006
Tel: (202) 663-6000
Email: gregory.lantier@wilmerhale.com
Email: amanda.major@wilmerhale.com

/s/ J. Stephen Ravel

J. Stephen Ravel
Texas State Bar No. 16584975
Kelly Ransom
Texas State Bar No. 24109427
KELLY HART & HALLMAN LLP
303 Colorado, Suite 2000
Austin, Texas 78701
Tel: (512) 495-6429
Email: steve.ravel@kellyhart.com
Email: kelly.ransom@kellyhart.com

James E. Wren
Texas State Bar No. 22018200
1 Bear Place, Unit 97288
Waco, Texas 76798
Tel: (254) 710-7670
Email: james.wren@baylor.edu

Attorneys for Intel Corporation

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system per Local Civil Rule CV-5(b)(1) on February 2, 2021.

/s/ J. Stephen Ravel

J. Stephen Ravel